

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO**

MELODY JOY CANTU AND DR. RODRIGO
CANTU,

5:20-CV-0746 JKP – HJB

Plaintiffs,

v.

DR. SANDRA GUERRA and DIGITAL
FORENSICS CORPORATION, LLC,

Defendants.

Second Continuance Request On Consent Of All Parties

Plaintiffs Dr. Rodrigo Cantu and Melody Joy Cantu, in their second continuance request, and Co-Defendants Dr. Sandra Guerra and Digital Forensics Corporation, LLC, through their undersigned attorneys, hereby stipulate:

1. The last filed motion in this matter is Plaintiffs' Reply in Support of Their Motion to Dismiss Dr. Sandra Guerra's Amended Counterclaims.
2. The parties are currently going through discovery. On March 15, 2021 counsel for Co-Defendant Dr. Sandra Guerra filed the ADR Report (Docket. No. 44). On March 17, 2021 expert designations are due.
3. On January 30, 2021, Plaintiff Melody Joy Cantu had a medical emergency; she was thrown off a horse. On February 1, 2021, Mrs. Cantu was in the ICU for a week having corrective surgery due to all but her four ribs being broken, a shattered clavicle, and a head injury.
4. Mrs. Cantu was dealing with pain management and recovery for the past month and a half. We requested the original continuance to allow her proper recovery time.
5. Last week, Mrs. Cantu was taken back to the ICU. One of her ribs was fragile and broke while she was recovering at home. This injury necessitated additional time in the ICU and further pain management.
6. Plaintiffs' counsel reached out to opposing counsel for both Co-Defendants and had a good faith conference regarding their request for a continuance. All parties are in agreement to a 60-day continuance. After which, they will reconvene to review whether another continuance is necessary.
7. All parties are in agreement and stipulate to a sixty-day continuance of our discovery deadlines. With the new deadlines as follows:

- May 17, 2021: Designation of Experts by Parties Asserting Claims
- June 1, 2021: Responses to Settlement Offers from Opposing Parties
- June 16, 2021: Last day to Amend/Supplement Pleadings, and Joinder
- July 1, 2021: Designation of Experts by Parties Resisting Claims
- August 16, 2021: Discovery Deadline
- August 30, 2021: Joint Report on Settlement Negotiations
- September 14, 2021: Last Day to File Dispositive Motions

Dated: March 15, 2021

Stipulated and respectfully submitted,

/s/ Tor Ekeland

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Dr. Rodrigo Cantu*

Certificate of Service

I certify that on this 15th of March 2021, a true and correct copy of the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system which will send electronic notification of such filing to the parties on record.

/s/ Tor Ekeland